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States Government

Department of Energy

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DATE 11-20-92Rocky Flats Office  
memorandum

ACTION Benedetti

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ERD BKT 11135

RFP Background Soil Characterization

Robert Benedetti Acting Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats Inc

This memorandum is a follow up to DOE memorandum ERD BKT 11059 dated December 26 1991 which requested that EG&G propose a program to characterize RFP and surrounding area soils EG&G has responded with memoranda 92 RF-0396 92 RF 1655 and 92 RF 7298 The second of these memoranda included an attachment consisting of a draft proposal for RFP surficial soil characterization. This proposal was the basis for our scoping meeting with the regulators The latter memorandum recommended that the surficial soil background characterization program provide information to facilitate CERCLA/RCRA risk assessment and the Natural Resource Damage Assessment Regulations located at 43CFR Part 11 DOE/RFO concurs with this recommendation and requests that 43CFR Part 11 62(e) be adequately addressed With regard to CERCLA/RCRA risk assessment, DOE/RFO requests that both human health and ecological risk assessment are facilitated by this program


A scoping meeting for RFP surficial soil background characterization was held with the regulators on March 11 1992 At this meeting the regulators indicated that a broad spectrum of analytes would be necessary since the RFP RFI/RI program has not proceeded sufficiently toward defining contaminants of concern (COC s) However it is doubtful that COC s could even be selected without adequate background data on soil background Thus a comprehensive analyte list consistent with the Phase I RFI/RI s at the RFP will be appropriate With regard to sampling and analytical methods the regulators indicated that both the RFI/RI and background data need to be comparable DOE/RFO concurs with this In addition the regulators indicated that it would be necessary to conduct the background characterization such that both on site and off site sampling are achieved This is a public acceptance issue and DOE/RFO concurs that off site sampling should be included

Please find attached an October 26 1992 letter from CDH to DOE/RFO requesting that the RFP Background Surficial Soils Study be performed They have further requested that we provide a reasonable date by which a formal proposal will be submitted to CDH and EPA for review and approval by November 20 1992

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We request that EG&G prepare a work package for the background characterization of surficial soils and that it be submitted to DOE/RFO by November 20 1992. This work package should contain a schedule for the development of a draft and final work plan and a draft and final RFP Background Soil Characterization Report. The EPA Quality Assurance Management staff data quality objective (DQO) process should be used to design the program. An intermediate product of this project should be a Sample and Analysis Plan (SAP) including both a Field Sampling Plan (FSP) and Quality Assurance Addendum to the QAPjP which will be a deliverable to EPA CDH and the Natural Resource Trustees for review and comment. In addition since many of the RFP RFI/RI workplans have not properly addressed surficial soils a proposal should be submitted to DOE/RFO along with the work package on how comparable data will be collected at each of the operable units.

Questions or concerns regarding this memorandum should be directed to Bruce Thatcher of my staff at extension 3532.

  
James K. Hartman  
Assistant Manager  
for Environmental Management

Attachment

cc w/Attachment.  
F Lockhart, ERD RFO  
R. Schassburger ERD ERD  
B Thatcher ERD RFO  
S Grace ERD RFO  
J Pepe ERD RFO  
B Birk ERD RFO  
S Surovchak ERD RFO  
M Arndt, EG&G  
M Levin EG&G  
D Smith EG&G  
M Guillaume EG&G  
I Litaor EG&G  
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E Dille EG&G